

**Summary of August 25, 1999**  
**Indiana Department of Environmental Management (IDEM) and**  
**Clean Manufacturing Technology and Safe Materials Institute (CMTI)**  
**Meeting with Metal Finishers and POTWs Participating in**  
**Metal Finishing Strategic Goals Program**

The meeting was called to order at 1:10 p.m. by facilitator Kathy Watson. The facilitator welcomed meeting participants and explained the two primary purposes of the meeting - recognition of the SGP signees and further development/refinement of the Indiana SGP implementation plan.

**REMARKS FROM IDEM and CMTI**

After introductions by those in attendance (**meeting roster attached**), IDEM Deputy Commissioner Tim Method provided opening remarks. Mr. Method commented that metal finishers and POTWs signing on to the Goals Program are role models for being proactive. The leaders here today have not only invested their efforts in meetings past and present, but in the pursuit of the facility-based performance goals. Today we start the public recognition process for this voluntary commitment and to move forward in the implementation of the program in Indiana. Mr. Method noted that IDEM is also working with CMTI to actively assist metal finishers in achieving their goals and thanked staff from both agencies for their efforts and commitment as well.

Dr. Lynn Corson, Director of CMTI and co-host for today's meeting, remarked that the SGP provides a new image for the sector in the state. Dr. Corson reiterated CMTI's offering of technical assistance services to SGP signees free of charge and the need for assistance in recruiting more planters to sign on to the Goals Program. He urged the audience to spread the word about the availability of the SGP and to encourage other companies to sign on to the Program. He also expressed CMTI's commitment to the sector goals and the desire to make this a landmark program for Indiana.

**RECOGNITION OF SGP SIGNEES**

Mr. Method and Dr. Corson presented framed pledge certificates to representatives of the ten metal finishing facilities and seven municipalities officially signing on to the Strategic Goals Program. Separate text included on the metal finisher certificates and POTW certificates was read by Dr. Corson as individual signees came forward to accept their pledge certificates. Those recognized include the following:

**Metal Finishers:**

Baycote Metal Finishing, Mishawaka  
Commercial Plating, Indianapolis  
Electrochemical Coatings, Lebanon  
Franke Plating Works, Fort Wayne  
H.H. Sumco, Indianapolis  
Imagineering Enterprises, South Bend  
McDowell Enterprises, Elkhart  
Metal Plate Polishing, Fort Wayne  
Seleco, Inc., Indianapolis  
Triplex Plating, Michigan City

**POTWs:**

City of Goshen Waste Water Treatment Plant  
Bureau of Water Quality, Muncie Sanitary District  
City of Elkhart  
Sanitary District of Michigan City  
City of Indianapolis  
Fort Wayne Water Pollution Control Plant  
City of Terre Haute

**Example metal finisher and POTW certificates are attached.**

## **NATIONAL/REGIONAL UPDATES**

### **Matt Gluckman, EPA Region 5 SGP Co-Lead**

1. Matt reported that the Strategic Goals Program “Summit” was held June 21-23, 1999 in Cincinnati, Ohio at the American Electroplaters and Surface Finishers Society (AESF) Sur-Fin ‘99 Convention and trade show. Matt stated that information learned during the Summit showed that Indiana is as far ahead in SGP implementation as anyone and the state has pulled together a strong, well-balanced effort. POTWs are signing on and the need for increased industry participation was also noted.
2. After a summer hiatus, the Chicago-SGP group will be reinvigorated this fall to produce a final implementation plan.
3. The State of Ohio is supporting the program as they can; all Region 5 states are active in the SGP, which may effect hazardous waste issues.
4. EPA Region 5 is seeking approval through EPA Headquarters to hire a new intern to provide support for the SGP in Region 5. The previous Region 5 SGP intern, Carrie Wallace, has left the agency.
5. The pretreatment streamlining rulemaking was proposed on July 22 with a 60 day public comment period. The public comment period may be extended as the Water Pollution Control Association and Association of Municipal Sewerage Agencies (AMSA) have asked for additional time to provide comments. Key areas of interest to POTWs and metal finishers in the proposed rule include:
  - not monitoring for pollutants not in system
  - oversight of small categorical facilities
  - concentration-based to mass limits to encourage conservation
  - significant non-compliance (SNC) issuesMatt noted that within a year or so we should find revisions to existing pretreatment regulations.

## **INDIVIDUAL WORKGROUP REPORTS**

### **RCRA Issues Workgroup**

Workgroup co-leads Gary Romesser of IDEM-RCRA and Mark Sutton of H.H. Sumco presented an update on six items under review by their workgroup as follows:

1. Mark Sutton noted that H.H. Sumco will take the first shot of going through the solid waste variance process and hopes to submit an application by October 1. Their request will be modeled after a similar request from an Arizona company. Mr. Sutton commented he would like to see help from regional or national EPA on this issue as the EPA regions are administering these programs differently. Matt Gluckman noted that we may need to raise the issue out of Region 5 quickly and suggested that the workgroup prepare a written document to frame the issue. The paper could explain the problems companies are facing, the desire for state reciprocity, and a process for reciprocity between Region 5 states. This paper could be shared with other state counterparts in the Region, and also shared nationally with SGP staff to facilitate their support at the national level. Matt also noted that all Region 5 states have been delegated authority for these provisions of the RCRA program.
2. Mr. Sutton also reported on segregation of sludges and Sumco’s efforts in separating out copper sulfate rinse baths. These efforts reduced 80% of the copper ultimately going into the waste, with the downside being that the company had to maintain a separate wastestream and the final wastewater treatment sludge is still a listed hazardous waste. David Benshoof commented that the issue of what to do with F006 wastewater treatment sludge is also a concern of his company. He also noted his company’s discussions with a smelter to buy their tin back. Mr. Sutton indicated his facility hopes to bypass the middle-man.
3. Gary Romesser reported that IDEM’s RCRA section had finalized guidance titled “Treatment of Hazardous Waste On-Site by Generators” dated July 12, 1999 (**attached**). Although workgroup participant Ted Heemstra could not attend today’s meeting, he did provide comments to Mark Sutton and Gary Romesser on what specifically might be relevant to metal finishers in this guidance.

4. Mark Stoddard of IDEM/OPPTA reported he has started the process of compiling a list of available metal reclaimers and solicited the assistance from metal finishers for information on who they send materials to.
5. Gary Romesser provided a copy of EPA's F006 benchmark study report for the ten SGP metal finishers. He also distributed a summary paper for Phase 1 of the F006 Benchmark Study (**copy attached**).

### **POTW Issues**

1. Tim Goldy reported that the POTW workgroup has met twice since the May SGP meeting. He also noted that several local ordinances will require revisions in order to reflect the SGP and incorporate flexibility. EPA's proposed pretreatment streamlining regulation will provide POTWs and facilities with quite a bit of flexibility. Sue Claussen commented that since the proposed streamlining regulation would apply to all companies, the SGP facilities no longer have an edge over other companies, which then becomes a program recruitment issue. However the SGP facilities could get a jump start on operational flexibility since it will take a while for the proposed rules to become effective.
2. Tim also reported that he invited 30 Elkhart metal finishers to a local SGP roundtable meeting, only 5 companies attended, and 2 of those were repeat visitors. Tim stressed the need for a tool to encourage people to join the program, with part of it being the development of incentives we need to offer.
3. Sue Classen suggested that potential activities dealing with Tier 3 performers (assisting companies transitioning out of business to prevent brownfield sites) might be an incentive for additional localities to sign on. She asked what IDEM is doing in this area. Debbie Dubenetzky responded that she has met with IDEM Brownfield's coordinator Dana Reed-Wise to discuss the SGP and we have received a copy of Rhode Island's Brownfield transition guide and other information. We could explore including brownfield (Tier 3) issues in the state SGP implementation plan. Sue noted that some local governments frown on use of local resources for what they see as a state/federal program. Sue also stressed the need for a succinct recruiting brochure.
4. Debbie Dubenetzky commented that the recognition workgroup has been tasked with developing an SGP brochure and SGP awareness article for publication in IDEM and trade publications. She also noted that in June EPA released an SGP "How To" guidance document with sections on developing state/local performance ladders. Other upcoming tools are forthcoming from EPA in late 1999 and early 2000 which will be considered as Indiana develops a state performance ladder and incentives.
5. Claudio Ternieden provided an update on the status of pretreatment delegation for Indiana. He noted restructuring within IDEM's Office of Water Management and move to a separate pretreatment section. Matt Gluckman's staff will be visiting IDEM for a pretreatment audit September 8 and 9. IDEM proposes to request from EPA Region 5 a clear-cut list of what the state needs to do for delegation of the pretreatment program. At the present time, OWM is exploring what rulemaking may be necessary and resource allocation issues.

### **Technical and Financial Assistance**

Shayla Barrett of CMTI provided the following updates:

1. Shayla has spoken with Melanie Darke of the Indiana Department of Commerce about the potential availability of Indiana Development Finance Authority (IDFA) loan program funds for SGP participants. A potential scenario was discussed where the equipment a company is purchasing is used as the collateral for the loan, similar to the California SGP program.
2. CMTI will be meeting with representatives of the Strategic Development Fund (SDF) in September about a possible SGP participants' grant (e.g., to address 25% energy reduction goal). Strategic Development Funds are grant dollars and require an in-kind match
3. Reiteration of CMTI's offer to continue to provide free, confidential technical and technology transfer assistance to interested metal finishers. Some participants have already contacted CMTI. Mark Stoddard (Indianapolis) and Doug Elliott (Northern Regional Office) of IDEM's Office of Pollution Prevention and Technical Assistance are also available to assist companies.

4. Shayla has identified other potential technical and financial assistance providers at Cinergy and Business Modernization and Technology. CMTI will report back at the next meeting on additional funding sources.

**Recommendation:**

Metal finishers to report back at next meeting on their interest in pursuing a loan program.

**Recognition**

Debbie Dubenetzky provided the following report on behalf of the recognition workgroup:

1. Cheri Storms of OPPTA joined the recognition workgroup and provided assistance in the development and preparation of the pledge certificate wall plaques presented today.
2. Additional recognition of SGP signees included preparation of an IDEM press release regarding the program and participants. Emily Stoller of IDEM's Office of Media and Communications was instrumental in preparation of the press advisory for today's meeting and the draft press release from IDEM. Emily will also be taking group and individual photographs of program signees following adjournment of this meeting. Debbie will provide copies of the press release to SGP signees later this week.
3. Emily is also assisting in the development of an SGP article to be published in the November/December issue of IDEM's *Indiana Environment and Materials Exchange* publication. This publication goes to a mailing list of over 20,000 persons. Sue Claussen asked about the ability to reproduce the article. Emily advised her to go through the Media and Communications Office in order to reprint portions of the article.
4. IDEM is also working with CMTI to develop a mailing list of approximately 360 Indiana metal finishers (facilities subject to either 413 or 433 categorical pretreatment standards). These facilities will be added to the mailing list to receive the *Indiana Environment* publication as necessary.
5. Other upcoming promotion of the SGP and recognition of official signees is planned for the Partners for P2 Conference to be held September 22 at the Valle Vista Conference Center in Indianapolis. Sue Classen noted that six CEUs are available to those attending this conference.
6. IDEM is also working to develop an SGP recruitment brochure with a target completion date prior to the September 22<sup>nd</sup> P2 conference.
7. Recognition workgroup is following national progress on developing performance ladder models as described in the June "How To" guide and per updates on the national SGP website. As noted earlier in the meeting, EPA has indicated additional resources that measure facility progress and guidance on evaluating credit are scheduled for completion in late 1999 and early 2000. These tools will assist in developing a 5 Star environmental recognition program for metal finishers over the next year.
8. Claudio Ternieden commented that recognition can also come at the local level. He stressed IDEM's willingness to spend time with cities and their industries to help in recruiting. He also noted the need for industry trade association assistance in these local recruiting efforts. Tim Goldy added that recognition of being "environmentally friendly" is important to some companies.

**NEXT STEPS**

Next steps offered by Tim Method and agreed to by meeting participants:

1. IDEM to take the lead in updating the Indiana SGP implementation plan document. The draft plan developed at the May SGP meeting was distributed by IDEM during the summer for comments and no written comments were received. Based on the discussions at this meeting, the plan will be updated to reflect key activity due dates and deliverables. Although the previous four ad hoc SGP workgroups can still meet, the implementation plan will be used for future meetings and organization. A fifth ad hoc workgroup focusing on recruitment issues is also needed. **A copy of the updated implementation plan draft is attached.**
2. Full stakeholder group to meet quarterly with meeting agendas focused on Indiana's implementation plan document. Specific agenda items could include any issues that arise in implementing the plan. Discussion can focus on strategies to overcome the implementation barriers encountered. Workgroup leads should keep Debbie Dubenetzky apprized of their activities and any problematic issues that arise.

3. Next full stakeholder meeting to be held on December 9 from 1:00 to 3:00 p.m. at the Marion County Extension Office. Agenda to include workgroup and metal finisher progress updates.  
Kevin Frecker noted that we should keep small platers in mind as we work to implement the program.

The facilitator adjourned the meeting at 3:15 p.m. Photographs of the SGP honorees were then taken.

**Attachments:** Meeting Roster

Example Metal Finisher and POTW Pledge Certificates

IDEM's 7/12/99 Guidance on "Treatment of Hazardous Waste On-Site by Generators"

Summary of F006 Benchmark Study (Phase 1 - 9/98) prepared by Gary Romesser, IDEM

Indiana SGP Implementation Plan for 1999-2000 - Revised 10/14/99